

WHITE & CASE LLP
1155 Avenue of the Americas
New York, New York 10036-2787
Telephone: (212) 819-8200
Facsimile: (212) 354-8113
Gerard Uzzi (GU – 2297)
Lisa Thompson (LT – 5176)

Wachovia Financial Center, Suite 4900
200 South Biscayne Blvd.
Miami, Florida 33131
(305) 371-2700
Thomas E Lauria (*admitted pro hac vice*)

Attorneys for the Ad Hoc Group
of Lehman Brothers Creditors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	: Case No. 08-13555 (JMP)
	:
Debtors.	: Jointly Administered
-----X	

**STATEMENT OF AD HOC GROUP OF LEHMAN BROTHERS CREDITORS
IN SUPPORT OF MOTION OF THE DEBTORS FOR THE ESTABLISHMENT
OF PROCEDURES TO (I) RESTRUCTURE, (II) MAKE NEW OR ADDITIONAL
DEBT OR EQUITY INVESTMENTS IN, AND/OR (III) ENTER INTO
SETTLEMENTS AND COMPROMISES IN CONNECTION
WITH EXISTING REAL ESTATE INVESTMENTS**

TO THE HONORABLE JAMES M. PECK,
UNITED STATES BANKRUPTCY JUDGE:

The Ad Hoc Group of Lehman Brothers Creditors (the “Group”), by and through its undersigned counsel, hereby files this statement in support of the Motion of the Debtors Pursuant to Sections 105(a) and 363(b) of the Bankruptcy Code and Bankruptcy Rule 9019(a) for the Establishment of Procedures to (I) Restructure, (II) Make New or Additional Debt or Equity Investments in, and/or (III) Enter into Settlements and Compromises in Connection with Existing

Real Estate Investments (the “Motion”) [Docket No. 5653] filed by Lehman Brothers Holdings Inc. (“LBHI”) and its affiliated debtors (collectively, the “Debtors”) in the above-referenced chapter 11 cases. In support of the Motion, the Group respectfully states as follows:

STATEMENT

1. Throughout these cases, the Group has worked with the Debtors and the Committee to ensure that, among other things, the Debtors’ motions establishing procedures to restructure, terminate, or compromise certain assets of the estates included periodic, public reporting to enable parties in interest to evaluate the ongoing success of such procedures once implemented. The Group believes that such periodic reporting helps achieve a balance between the need for oversight by parties in interest and the need for the Debtors to efficiently administer these cases.

2. The Group notes that while in this instance, as proposed, the Motion includes a periodic reporting requirement (See Motion ¶ 18.), the Group continues to work with the Debtors to improve public disclosures generally, and specifically with respect to the Debtors’ real estate assets. The Group is optimistic that, as a consequence of these discussions, the Debtors will adequately address any future concerns raised by the Group with respect to further disclosures related to their real estate assets. In the event discussions with the Debtors do not proceed as expected, the Group nonetheless reserves its rights to seek appropriate relief from the Court with respect to further public dissemination of such information.

3. The Group submits that the Real Estate Protocol¹ strikes the appropriate balance between efficiency on the one hand and transparency on the other. The Group appreciates the Committee’s efforts in ensuring that the Real Estate Protocol includes a periodic reporting requirement and, as such, supports the relief requested in the Motion.

¹ Capitalized terms not otherwise defined herein are defined in the Motion.

WHEREFORE, for the foregoing reasons, the Group supports approval of the Motion.

Dated: November 17, 2009
New York, New York

Respectfully submitted,

WHITE & CASE LLP
1155 Avenue of the Americas
New York, New York 10036-2787
Telephone: (212) 819-8200
Facsimile: (212) 354-8113
Gerard Uzzi (GU - 2297)
Lisa Thompson (LT - 5176)

By: /s/ Gerard Uzzi
Gerard Uzzi

Wachovia Financial Center
200 South Biscayne Boulevard, 49th Floor
Miami, Florida 33131
Telephone: (305) 371-2700
Facsimile: (205) 358-5744
Thomas E Lauria (*admitted pro hac vice*)

ATTORNEYS FOR THE AD HOC GROUP
OF LEHMAN BROTHERS CREDITORS